

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

JUL - 8 2015

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
                                )  
                                )  
Plaintiff,                 )  
                                )  
v.                            )  
                                )  
                                )  
POE PURCELL,              ) COUNTS I, II, and V  
CHALAMAR SCHULTZ         )  
TUIPELEHAKE, and         ) COUNTS I, II, and V  
FRANCIS FROST,            ) COUNTS I-V  
                                )  
Defendants.                )

**4:15CR316 JAR/SPM**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but including February 2015, and through the date of this indictment, with the exact dates unknown to this Grand Jury, within the Eastern District of Missouri, and elsewhere, the defendants,

**POE PURCELL,  
CHALAMAR SCHULTZ TUIPELEHAKE, and  
FRANCIS FROST,**

did knowingly and willfully conspire, combine, confederate and agree together with each other and persons both known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to distribute actual methamphetamine, and to possess with the intent to distribute actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and

Quantity of Actual Methamphetamine Involved in the Conspiracy

With respect to each defendant, the amount of actual methamphetamine involved in the conspiracy attributable to him as result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50 grams or more, punishable under Title 21, United States Code, Section 841(b)(1)(A)(viii).

All in violation of Title 21, United States Code, Section 846.

**COUNT II**

The Grand Jury further charges that:

Beginning at a time unknown, but including the period from May 2015 through and including the date of this indictment, with the exact dates unknown to this Grand Jury, in the Eastern District of Missouri, and elsewhere, the defendants,

**POE PURCELL,  
CHALAMAR SCHULTZ TUIPELEHAKE, and  
FRANCIS FROST,**

did knowingly and willfully conspire, combine, confederate and agree with each other, and other persons known and unknown to this Grand Jury, to commit offenses against the United States to wit: to distribute cocaine, and to possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and

Quantity of Cocaine Involved in the Conspiracy

With respect to each defendant, the amount of cocaine involved in the conspiracy attributable to each defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more, punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii).

All in violation of Title 21, United States Code, Section 846.

**COUNT III**

The Grand Jury further charges that:

On or about May 23, 2015, within the Eastern District of Missouri, and elsewhere, the defendant,

**FRANCIS FROST,**

did knowingly and intentionally possess with the intent to distribute actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and the amount of actual methamphetamine involved in the offense is 50 grams or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(viii).

**COUNT IV**

The Grand Jury further charges that:

Beginning at an exact time unknown to the Grand Jury but including the period between May 19 and May 23, 2015, in the Eastern District of Missouri, and elsewhere, the defendant,

**FRANCIS FROST,**

did knowingly and intentionally attempt to commit the following offense against the United States: to knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and that the defendant committed a substantial step in furtherance thereof.

All in violation of Title 21, United States Code, Section 846; and

The quantity of mixture or substance containing a detectable amount of cocaine involved in the offense attributable to **FRANCIS FROST** was five kilograms or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(ii)(II).

**COUNT V**

The Grand Jury further charges that:

A. **THE CONSPIRACY**

Beginning at a time unknown to the Grand Jury, but including February 2015, and through the date of this indictment, with the exact dates unknown to this Grand Jury, within the Eastern District of Missouri, and elsewhere, the defendants,

**POE PURCELL,  
CHALAMAR SCHULTZ TUIPELEHAKE, and  
FRANCIS FROST,**

did knowingly and willfully conspire, combine, confederate and agree together with each other and persons both known and unknown to this Grand Jury, to commit the following offenses against the United States:

- (1) to enter by fraud and false pretenses any secure area of any airport, in violation of Title 18, United States Code, Section 1036(a)(4); and
- (2) to knowingly enter, in violation of security requirements, an airport area that serves an air carrier with the intent to evade security procedures, and with the intent to commit, in the airport area, a felony under the law of the United States in violation of Title 49, United States Code, Section 46314, namely:
  - a. conspiracy to distribute controlled substances, methamphetamine and cocaine;
  - b. possession with the intent distribute methamphetamine and cocaine; and
  - c. distribution of methamphetamine and cocaine.

B. **OBJECT OF THE CONSPIRACY**

The object of the conspiracy was for the defendants and persons known and unknown to the Grand Jury to achieve a common goal, that is: to circumvent and evade established security

procedures at Los Angeles International Airport for commercial airlines in order to facilitate and further illegal drug trafficking from Los Angeles, California to other destination cities, including St. Louis, Missouri.

C. **OVERT ACTS**

In furtherance of and to effect the objects of the conspiracy, one or more of the co-conspirators committed and caused to be committed one or more of the following overt acts in the Eastern District of Missouri, and elsewhere:

(1) Beginning in or about 2001, **POE PURCELL** became an American Airlines Cargo Fleet Service Clerk at Los Angeles International Airport.

(2) **POE PURCELL** continued to be employed by American Airlines Cargo throughout the duration of the conspiracy.

(3) During the course of the conspiracy, including the time period between February and May 2015, **CHALAMAR SCHULTZ TUIPELEHAKE** offered a service to illegal drug traffickers whereby **CHALAMAR SCHULTZ TUIPELEHAKE**, in exchange for United States currency, would enlist his purported "relative," later determined to be **POE PURCELL**, to transport illegal controlled substances from Los Angeles, California on a commercial airliner to other locations.

(4) On or about February 7, 2015, **FRANCIS FROST** traveled via American Airlines from Los Angeles International Airport to Lambert International Airport in St. Louis, Missouri, and within the Eastern District of Missouri, to receive and distribute methamphetamine transported pursuant to the conspiracy described herein.

(5) On or about March 12, 2015, **FRANCIS FROST** traveled via American Airlines from Los Angeles International Airport to Lambert International Airport in St. Louis, Missouri,

and within the Eastern District of Missouri, to receive and distribute methamphetamine transported pursuant to the conspiracy described herein.

(6) On or about March 18, 2015, in Fullerton, California, **CHALAMAR SCHULTZ TUIPELEHAKE** accepted a payment of \$6,500.00 in United States currency as consideration for the transportation of a distribution amount of methamphetamine from Los Angeles, California to St. Louis, Missouri, pursuant to the scheme described herein.

(7) On or about May 19, 2015, in Ontario, California, **CHALAMAR SCHULTZ TUIPELEHAKE**, took possession of five kilograms of a simulated controlled substance, represented to be cocaine, and \$4,000.00 in United States currency which was to serve as partial payment for the cost of transporting the purported five kilograms of cocaine from Los Angeles, California to St. Louis, Missouri, pursuant to the scheme described herein.

(8) Between May 20 and May 21, 2015, **CHALAMAR SCHULTZ TUIPELEHAKE** caused the package containing the purported five kilograms of cocaine to be delivered to a residence associated with **POE PURCELL** at or near Paramount, California.

(9) On or about May 21, 2015, **POE PURCELL** transported a suitcase containing the package holding the purported five kilograms of cocaine to the American Airlines Cargo warehouse at Los Angeles International Airport, and thereafter caused the suitcase and package to be delivered to Terminal 4 at Los Angeles International Airport for transportation to Lambert International Airport, within the Eastern District of Missouri.

(10) Between on or about May 21 and May 23, 2015, **POE PURCELL** caused a second suitcase containing actual methamphetamine to be transported from Los Angeles International Airport to Lambert International Airport, within the Eastern District of Missouri.

(11) On or about May 23, 2015, **FRANCIS FROST**, traveled from Los Angeles International Airport to Lambert International Airport, within the Eastern District of Missouri, via American Airlines.

(12) On or about May 23, 2015, **FRANCIS FROST**, upon his arrival at Lambert International Airport, contacted personnel at the American Airlines Lost Baggage Claim and took possession of the suitcase containing the purported 5 kilograms of cocaine and the second suitcase containing actual methamphetamine.

In violation of Title 18, United States Code, Section 371.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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Assistant United States Attorney